

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST  
TOKYO, JAPAN

Case No. 1

THE UNITED STATES OF AMERICA, et al

Paper No. 731

- vs -

ARAKI, Sadao, et al

-Defendant-

APPLICATION ON BEHALF OF HASHIMOTO,  
Kingoro, FOR AN ORDER FOR THE PRO-  
DUCTION OF A WITNESS

COMES NOW HASHIMOTO, Kingoro, and respectfully requests the Tribunal, in accordance with Section III, Article 9 (1) of the Charter, to order the production of the following named witness necessary to his defense:

1. KUZUU, Yoshihisa

- a. The nationality of the witness is Japanese;
- b. The witness is now in Sugamo Prison;
- c. The witness was at various times a member of the KOKURYU-KAI and the Imperial Rule Assistance Association;
- d. The testimony of this witness will deal with:

- (1) The purpose of the Imperial Rule Assistance Association;
- (2) The corrupt state of Japanese politics from about 1929 to 1931, and its relation to the Reform Movements of that period; and other relevant matters.

- e. The testimony of this witness is considered necessary to the defense of the accused in regard to Counts 1 to 17 inclusive of the Indictment;
- f. This application was not made earlier as required by this Tribunal for the following reasons:

(1) It was anticipated that OTA, Kozo and IKEZAKI, Chuko would testify to matters dealing with the above subjects but these persons have since stated that they are reluctant to appear as witnesses in the trial. Had they consented it was the intent of the defendant HASHIMOTO not to call KUZUU, Yoshihisa since his testimony though important would have been cumulative.

Dated, Tokyo, Japan  
18 February 1947

HASHIMOTO, Kingoro

By

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HAYASHI, Itsuro

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E. R. HARRIS  
His Counsel